

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF PENNSYLVANIA  
PITTSBURGH DIVISION**

In re:	Bankruptcy No. 19-23944-CMB
Eileen Marie Stamps, Debtor	Chapter 13
Lakeview Loan Servicing, LLC. Movant	Related to Doc. No. 13
v.	
Eileen Marie Stamps Debtor/Respondent	
Ronda J. Winnecour, Esquire Trustee/Respondent	

**U.S. BANK’S OBJECTION TO CONFIRMATION OF DEBTOR’S CHAPTER 13 PLAN**

Secured creditor, Lakeview Loan Servicing, LLC, (“Lakeview”) by and through its undersigned counsel, hereby objects to the proposed Chapter 13 Plan of Debtor, Eileen Marie Stamps, and in support thereof alleges as follows:

1. Debtor, Eileen Marie Stamps (“Debtor”), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on October 8, 2019.
2. Lakeview holds a security interest in the Debtor’s real property located at 2640 Russell Drive, Lower Burrell, PA 15068 (the “Property”), by virtue of a Mortgage recorded with the Dauphin County Recorder of Deeds on May 2, 2005 in Instrument Number 200505020020952.
3. Said Mortgage secures a Note in the amount of \$77,975.00.

4. On December 17, 2019, Lakeview filed its Proof of Claim as a secured creditor in the amount of \$60,982.84. A true and correct copy of the Proof of Claim (with all supporting documents) is attached hereto as Exhibit "A."
5. The Proof of Claim further sets forth and itemizes a pre-petition arrearage of \$5,309.90. See Exhibit "A."
6. On October 22, 2019, Debtor filed a Chapter 13 Plan (the "Plan"). A true and correct copy of the Plan is attached hereto as Exhibit "B."
7. The Plan fails to account for the full pre-petition arrearage of \$5,309.90, as it fails to state a total sum of \$5,309.90, that will be paid through the Plan. See Exhibit "B."
8. Thus, the Plan is understated as it does not accurately reflect the amount of the pre-petition arrearage which will be paid through the Chapter 13 Trustee's Office.
9. Accordingly, pursuant to 11 U.S.C.A. § 1325(a)(5) Lakeview hereby objects to Debtor's proposed Plan due to the fact that the value of the property to be distributed thereunder will be less than the allowed amount under the claim. See 11 U.S.C.A. § 1325(a)(5)(B)(ii).

WHEREFORE, Movant, Lakeview Loan Servicing, LLC, respectfully requests that this Court not confirm the Chapter 13 Plan of Debtor, Eileen Marie Stamps.

RAS Crane, LLC  
Attorney for Secured Creditor  
10700 Abbott's Bridge Road, Suite 170  
Duluth, GA 30097  
Telephone: 470-321-7112  
Facsimile: 404-393-1425

By: /s/Sheetal Shah-Jani  
Sheetal Shah-Jani, Esquire  
Pennsylvania Bar Number \*\*MISSING\*\*  
Email: sshahjani@rascrane.com

Date: January 7, 2020

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF PENNSYLVANIA  
PITTSBURGH DIVISION**

In re:  Eileen Marie Stamps, Debtor  Lakeview Loan Servicing, LLC. Movant  v. Eileen Marie Stamps Debtor/Respondent Ronda J. Winnecour, Esquire Trustee/Respondent	Bankruptcy No. 19-23944-CMB  Chapter 13  Related to Doc. No. 13
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on January 7, 2020, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via CM/ECF or United States Mail to the following parties:

JUSTIN P. SCHANTZ  
LAW CARE  
324 S. MAPLE AVENUE, 2ND FLOOR  
GREENSBURG, PA 15601

EILEEN MARIE STAMPS  
2640 RUSSELL DRIVE  
NEW KENSINGTON, PA 15068

RONDA J. WINNECOUR  
SUITE 3250, USX TOWER  
600 GRANT STREET  
PITTSBURGH, PA 15219

OFFICE OF THE UNITED STATES TRUSTEE  
LIBERTY CENTER.  
1001 LIBERTY AVENUE, SUITE 970  
PITTSBURGH, PA 15222

RAS Crane, LLC  
Attorney for Secured Creditor  
10700 Abbott's Bridge Road, Suite 170  
Duluth, GA 30097  
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By: /s/Sheetal Shah-Jani  
Sheetal Shah-Jani, Esquire  
Pennsylvania Bar Number \*\*MISSING\*\*  
Email: sshahjani@rascrane.com

Date: January 7, 2020